

The Public Safety Working Group (Region 17 Regional Planning Committee) of the Kentucky Wireless Interoperability Executive Committee **does not support the certain provisions of the FCC Report and Order and Further Notice of Proposed Rulemaking, FCC 07-72 released on April 27th, 2007.** Region 17 is very concerned that this proposed Rulemaking regarding 700MHz Data will hamper Kentucky's special public safety communications goals.

Kentucky established a comprehensive 800MHz Mobile data standard in 2004 and has installed a statewide infrastructure mobile data network. Contributing to the success of the system is the fact that the Commonwealth of Kentucky has installed and maintains the network and all state and local users operate at no cost except for the initial cost of the mobile equipment. The network operates on Kentucky's public safety microwave communications system (KEWS) and connects all public safety agencies including both law enforcement and all other public safety disciplines.

Kentucky's system is widely accepted, fills a critical communications need and is designed for the future. Planning is underway to expand our present 800MHz data system into a robust 700MHz data system statewide with varying bandwidth. We firmly believe in national standards for 700 MHz mobile data and for future growth through wide band and ultimately to broadband band data, however we strongly believe in local governmental control of the network.

Region 17 favors a spectrum solution that involves a standards base for both wideband (50 KHz - 150 KHz) and broadband channels (above 1 MHz bandwidth). The wideband channel would give greater coverage in rural areas but have a lower data rate and broadband for usage in urban / suburban areas or which ever fits the department's need the best. This could be similar to some user having dial up service while other have DSL and broadband cable.

In summary, Region 17 supports in part the national need for broadband for Public Safety but with the option and flexibility to develop and implement local data requirements.

Thank you for your consideration of these comments. We look forward to working with the Commission as it addresses these matters of great importance to public safety agencies.

Respectfully submitted,



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